

- 2 -

REMARKS

Examiner's reply to Applicant's response dated 25 March 2003 is noted.

Applicant submits that Examiner has utterly failed to fulfil his duty under US patent law and USPTO practice. In particular, Examiner's attention is drawn to MPEP 707.07(f), where it is stated that "Where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it."

In this case, Examiner has apparently rejected over two pages of detailed, relevant argument with a single sentence that does not address any of Applicant's comments, arguments and questions.

Examiner's attention is also drawn to the following paragraphs in the MPEP:

- MPEP 707: "The examiner's action will be complete as to all matters..."
- MPEP 707.07(g): "Piecemeal examination should be avoided as much as possible. The examiner ordinarily should reject each claim on all valid grounds available..."
- MPEP 904: "The first search should be such that the examiner need not ordinarily make a second search of the prior art" and "The first search should cover the invention as described and claimed, including the inventive concepts toward which the claims appear to be directed."
- MPEP 904.02: "The search should cover the claimed subject matter and should also cover the disclosed features which might reasonably be expected to be claimed."

Examiner has clearly failed to follow these guidelines at even their most basic level.

Given that an opportunity to rectify this oversight has already been provided, Applicant sees no alternative but to instigate a formal complaints procedure against Examiner.

In the meantime, Examiner is again requested to follow US patent law and the USPTO guidelines and provide Applicant with an opportunity to pursue patent protection for the invention defined in the present claims. To this end, Applicant requests that Examiner reply to the arguments raised in the response dated 25 March 2003. For Examiner's convenience, a copy of the substance of that submission is attached.

- 3 -

We attach two (2) months extension of time fees as one (1) month was already paid with our response dated March 25, 2003.

- 3 -

CONCLUSION

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

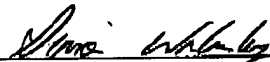
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- 3 -

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REMARKS

1. In paragraph 5 of the Detailed Action the Examiner has rejected claims 1-54, 58, 59-99 and 103-107 as being anticipated by Dymetman et al (US 6,330,976) in view of Heckman. In response, the Applicant makes the following points:

(a) The Examiner states that "*Dymetman et al ...fail to disclose or fairly suggest [that] the visible information and the invisible information are disposed on the surface substantially simultaneously.*" The Applicant agrees with this statement.

(b) However, the Examiner then suggests that Heckman discloses the claimed feature. In reply, the Applicant submits that Heckman does not disclose a region in which "*the coded data and the additional data having been disposed on the surface substantially simultaneously*" and in which "*the coded data comprises machine-readable data which is substantially inscrutable to the average unaided human.*" Nowhere in Heckman is there any disclosure of the printing of machine-readable data which is substantially inscrutable to the average unaided human. The disclosure of the "latent" information in Heckman is not machine-readable data, but human-readable data. This latent information changes from being invisible to being visible when a copy is made of the secure document. This is so that a user can see that it is a forgery (See col. 9 line 59 to col. 10 line 3). Heckman therefore does not disclose a region in which "*the coded data and the additional data having been disposed on the surface substantially simultaneously*" as claimed in claim 1. Dymetman and Heckman therefore do not anticipate claim 1.

2. In paragraph 9, the Examiner contests the Applicant's argument that Dymetman does not disclose simultaneous printing of coded and additional data by suggesting that "*Dymetman is only providing an example of how the invention could be used. Figure 4 shows a security document where both visible and invisible information are printed thereon.*"

However, Figure 4 of Dymetman does not show a security document. It shows a map. The Examiner may be confusing Figure 4 of Dymetman with Figure 4 of Heckman. In any event, as argued above, Figure 4 of Heckman does not disclose any "*machine-readable data*" which is "*substantially inscrutable to the average unaided human*" and in which "*the coded data and the additional data having been disposed on the surface substantially simultaneously.*"

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The Applicant maintains the position that Dymetman teaches away from simultaneous printing of coded and additional data since it teaches pre-printing of coded sheets for sale to publishers who then print additional data thereon.

The Applicant submits that neither Dymetman nor Heckman disclose any "machine-readable data" which is is "substantially inscrutable to the average unaided human" and in which "the coded data and the additional data having been disposed on the surface substantially simultaneously."

3. The Applicant notes that the Examiner has clearly ignored a large number of claims in his Examination. The Office Action only addresses issues concerning independent claims 1 and 59. The Examiner has not pointed out the relevance (if any) of the cited art to any of the dependent claims. The Examiner is requested to fully consider all 107 claims.

4. In paragraph 2 of the Office Action the Examiner has argued that there is no antecedent basis for "the coded data and the additional data having been disposed on the surface substantially simultaneously." In response, the Examiner's attention is drawn in particular to the section of the specification beginning on page 13 entitled "1.1 Netpages." The Applicant submits that one of ordinary skill in the art would understand from this description that the coded data and additional data are printed on Netpages substantially simultaneously.

5. The Applicant further challenges the Examiner's decision to make this action final for the following reasons:

(a) The Office Action raised Heckman as entirely new prior art. By making this action final the Examiner has limited the Applicant's ability to fully consider and respond to this new prior art. The Examiner has suggested in paragraph 10 that the "Applicant's amendment necessitated the new ground(s) of rejection." However, the Applicant points out that original claims 41 and 44 disclose a region in which both the tags and the additional information are printed by the same printer. These claims imply the simultaneous printing of coded and additional data which was explicitly included in the amendments to claim 1. Given the content of these original claims, the Applicant contests the Examiner's suggestion that the objections in the latest Office Action were necessitated by the Applicant's

- 5 -

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amendment.

(b) As argued in paragraph 3 above, it is clear that the Examiner has not conducted a prior art search in respect of all of the claims. The Applicant has paid a significant amount of extra claim fees in order to have all 107 claims examined. The Applicant requests that the Examiner fully consider all of these claims and issue a further Office Action which deals with these clearly ignored claims.

Should the Examiner ignore this request to fully consider all 107 claims the Applicant reserves the right to take the issue up with the Examiner's supervisor, Michael G Lee.

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